

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**2018 BUGATTI CHIRON (VIN#:
VF9SP3V34JM795083),**

Defendants *in rem*.

Civil No. 23-1392 (MDM)

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
PROPOSED DISCOVERY TIMETABLE**

Claimants Golden Exotics, LLC and Kevin Thobias (together, “Claimants”), by counsel, hereby move this Court to extend the deadline to file the proposed scheduling timetable up to and including October 8, 2024, and in support state as follows:

1. On or about June 2, 2023, government authorities with the Department of Homeland Security (“DHS”), seized a 2018 Bugatti Chiron (VIN#: VF9SP3V34JM795083) (the “Vehicle”) belonging to Golden Exotics, LLC, a company in which Claimant Kevin Thobias is the sole member.
2. The Vehicle was seized in Miami, Florida.
3. On or about August 2, 2023 the Government filed a complaint for forfeiture *in rem* of the Vehicle. (ECF No. 1).
4. On or about September 25, 2024, this Court ordered the parties to file a proposed timetable for discovery on or before October 4, 2024. (ECF No. 53).

5. Claimants counsel requests to extend the discovery timetable filing deadline due to the unavailability of counsel during the Jewish holiday of Rosh Hashana, which begins October 2, 2024 in the evening and such unavailability extends through the end of Sabbath on October 5, 2024.

6. Counsel for Claimants conferred with counsel for Plaintiff regarding the request for extension of time, and she has no objection to the extension of time sought in this motion.

7. The undersigned counsel submits this motion in good faith and not for the purposes of delay. Such extension, if granted, should not have any effect on either Plaintiff or on any other deadlines set by this Court.

WHEREFORE, Claimants, Golden Exotics, LLC and Kevin Thobias, respectfully request that the Court enter an Order granting the parties an extension of time, up to and including October 8, 2024, to file the proposed discovery schedule, or for such other relief as the Court deems proper.

WE HEREBY CERTIFY that we electronically filed the instant claim using the CM/ECF System, which will send notification to all counsel of record.

Respectfully submitted on October 2, 2024.

s/ Jonathan Edderai
Admitted Pro Hac Vice
 Wolffers Cohen & Edderai, LLP
 1132 Kane Concourse, Suite 205
 Bay Harbor Islands, FL 33154
jonathan@wolfferscohen.com
 Office: (786) 505-0431
 Fax: (786) 544-2619

and,



PO Box 195075
San Juan, PR 00919-5075
Tel.: (787) 523-3434
Fax: (787) 523-3433
ndelnido@cstlawpr.com

s/NATALIA E. DEL NIDO RODRÍGUEZ
USDC PR NO. 301410

Counsel for Claimants